

EXHIBIT 2

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ETOPIA EVANS, as the Representative of the)
 Estate of Charles Evans, et al.,)
)
 Plaintiffs,)
)
 vs.)
)
 ARIZONA CARDINALS FOOTBALL CLUB,)
 LLC, et al.,)
)
 Defendants.)

Case No. 3:16-cv-01030-WHA

**PLAINTIFF REGINALD WALKER'S
 SUPPLEMENTAL ANSWERS TO
 DEFENDANT NFL MEMBER CLUBS'
 FIRST SET OF INTERROGATORIES**

1 Plaintiff Reginald Walker ("Mr. Walker"), by and through his attorneys, provides the
 2 following Supplemental Answers to the First Set of Interrogatories propounded by Defendant
 3 NFL Member Clubs pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Local
 4 Civil Rules of the United States District Court for the Northern District of California. None of
 5 the objections or responses contained herein is an admission concerning the existence of any
 6 documents or materials or the relevance or admissibility of any documents, materials, or
 7 information. In providing these answers, Mr. Walker expressly reserves: (a) the right to object,
 8 on the grounds of competency, privilege, relevancy, materiality, or any other proper grounds, to
 9 the use of the information provided herein, in whole or in part, in any subsequent proceeding in
 10 this action or any other action; (b) the right to object on any and all grounds, at any time, to other
 11 discovery requests involving or relating to the subject matter of these Interrogatories; and (c) the
 12 right at any time to supplement, revise, correct, or clarify any of the responses provided herein.

13 ANSWERS

14 1. Describe any injury, damage, medical condition, harm, or loss that YOU
 15 claim was caused by any NFL MEMBER CLUB, including, but not limited to, any injury,
 16 medical condition, damage, harm, or loss allegedly caused, in whole or in part, by the
 17 allegedly wrongful provision or administration of MEDICATIONS, and/or any
 18 COMMUNICATION (or absence of a COMMUNICATION) CONCERNING OR RELATING
 TO MEDICATIONS that YOU contend to be wrongful, and state the date on which and the
 circumstances under which YOU first learned of such injury, damage, medical condition, harm,
 or loss.

19 **ANSWER:** Subsequent to the issuance of this interrogatory, counsel for the parties
 20 narrowed its scope to the specific injuries about which Plaintiffs are suing, including the dates
 21 and circumstances in which Plaintiffs discovered or first became aware of those injuries, all of
 22 which is subject to what Plaintiffs can recall, with Defendants reserving the right to seek an
 23 answer to the interrogatory as originally posed and Plaintiffs reserving the right to object.
 24 Subject to the foregoing, Mr. Walker states that he suffers from muscular/skeletal injuries
 25 resulting directly from the Clubs' illegal distribution of Medications associated with the
 26 following injuries he sustained during his employment with the NFL Member Clubs:
 27
 28

- 1 • At some point during his 2010 season with the Arizona Cardinals, Mr. Walker
2 strained his left hamstring. This injury was not given adequate time to heal and Mr.
3 Walker re-aggravated the same left hamstring strain later that season.
- 4 • At some point during his 2010 season with the Arizona Cardinals, Mr. Walker
5 strained his right hamstring.
- 6 • At some point during his 2010 season with the Arizona Cardinals, Mr. Walker tore a
7 ligament in his left shoulder.
- 8 • In 2011 during his employment with the Arizona Cardinals, Mr. Walker underwent
9 arthroscopic surgery on his left elbow, which had been "sticking" on a regular basis.
10 That problem, and its associated discomfort, had been progressing for some time and
11 was exacerbated by professional football. The surgery was performed at a hospital in
12 Phoenix, Arizona, the name of which Mr. Walker cannot recall at this time. The
13 surgery initially helped alleviate the left elbow pain but that relief was only
14 temporary.
- 15 • On September 21, 2014 during a game between the San Diego Chargers and the
16 Buffalo Bills, Mr. Walker sustained a high ankle sprain to his right ankle.
- 17 • On November 23, 2014 during a game between the San Diego Chargers and the St.
18 Louis Rams, Mr. Walker sustained a diagnosed concussion.

19 In addition to the specific injuries listed herein, throughout his employment with the NFL
20 MEMBER CLUBS, Mr. Walker sustained numerous lesser injuries to his entire body on a
21 repetitive basis. Due to the physical nature of professional football, it would be impossible for
22 him to recall each and every lesser injury sustained throughout his entire career. That fact
23 notwithstanding, such lesser injuries would typically include contusions, lacerations, strains
24 and/or sprains to various areas of the body including, but not limited to, joints, tendons,
25 ligaments, muscles, and/or bones. Mr. Walker would frequently experience exacerbations and
26 aggravations of these lesser injuries due to the requirements of professional football.

1 Following his retirement from the NFL, the injuries suffered by Mr. Walker as identified
2 above have manifested as follows:

- 3 • Mr. Walker currently has little movement in his left elbow and the pinky and ring
4 fingers on his left hand are constantly numb;
- 5 • Mr. Walker experiences constant pain and stiffness in both ankles, knees and hips.
- 6 • Mr. Walker experiences regular discomfort in his lower back. This pain is typically
7 intensified in Mr. Walker by prolonged sitting.
- 8 • Mr. Walker experiences imbalanced functioning of his left and right legs. He feels
9 that his right leg is shorter than his left leg which makes day-to-day functionality
10 more difficult.

11 **SUPPLEMENTAL ANSWER:** Subsequent to Mr. Walker's supplemental answer, the
12 parties further refined the scope of this interrogatory to call for only those injuries that Plaintiffs
13 claim were caused by the alleged wrongful provision or administration of Medications or
14 Communications concerning or relating to Medications or any other conduct of Defendants that
15 Plaintiffs purport to challenge in this lawsuit and the date on which Plaintiffs became aware that
16 an injury was purportedly related to the alleged wrongful provision of Medications or
17 Communications regarding those Medications. Subject to the foregoing, Mr. Walker states that
18 he has suffered muscular-skeletal injuries exacerbated by the Clubs' administration of
19 Medications to keep players on the field or in practice. Specifically, he suffers from the
20 following injuries, all of which he contends were caused in whole or part by the Clubs'
21 administration of Medications and/or failure to provide information relating to said
22 administration:

- 23 • Mr. Walker experiences constant pain and stiffness in both ankles, knees and hips.
- 24 • Mr. Walker experiences regular discomfort in his lower back. This pain is typically
25 intensified in Mr. Walker by prolonged sitting.
- 26 • Mr. Walker experiences imbalanced functioning of his left and right legs.

1 Mr. Walker further states that he did not learn that the foregoing injuries were related to
 2 the wrongful provision of Medications or Communications, or lack thereof, relating to
 3 Medications until some time after May 2014 when the Dent lawsuit was filed. Mr. Walker
 4 cannot recall specifically when he learned of the filing of that suit, the substance of the claims at
 5 issue, or that the allegations of that suit could apply to his career with any more specificity.
 6 Otherwise, see Mr. Walker's deposition for testimony addressing when the foregoing injuries
 7 first manifested, to the extent the foregoing does not specifically address that issue.

8 3. IDENTIFY each and every MEDICATION that YOU took while employed by any
 9 NFL MEMBER CLUB that YOU claim were provided to YOU, directly or indirectly, by any
 10 NFL MEMBER CLUB, or any HEALTHCARE PROVIDER or trainer affiliated with any NFL
 11 MEMBER CLUB.

12 **ANSWER:** Subject to Fed. R. Civ. P. 33(d), this Interrogatory may be answered by
 13 examining Mr. Walker's medical records, which he has authorized the NFL Member Clubs to
 14 obtain through his executed HIP AA release, and through documents produced herewith, as the
 15 burden of deriving or ascertaining the answer is the same for all parties.

16 In addition, Mr. Walker provides the following information currently within his
 17 knowledge. Mr. Walker does not recall the dosage of the Medications he received (unless
 18 otherwise identified below) and, more often than not, the persons providing the Medications to
 19 Mr. Walker did not advise him of the dosages and, to the extent the Medications were provided
 20 in containers (regardless of what type of container), the containers did not identify the dosage.

21 Mr. Walker further states that:

- 22 • During his employment with the Arizona Cardinals, he regularly received – and took
 23 upon receipt- pain-numbing and anti-inflammatory Medications in tablet or capsule
 24 form. Often these Medications were provided to him in envelopes or packages that
 25 did not identify the Medication or by doctors or trainers who failed to identify the
 26 Medication. He specifically remembers receiving Toradol by injection for almost
 27 every game he played with the Cardinals. He also remembers receiving Celebrex
 28 tablets. Team doctors, including Drs. Amit Sahasrabudhe and Doug Freedberg,
 administered the injections. Trainers, including Jeff Herndon, Jim Shearer and Tom
 Reed administered the tablets/capsules.
- During his employment with the San Diego Chargers, he regularly received – and
 took upon receipt- pain-numbing and anti-inflammatory Medications in tablet or
 capsule form. Often these Medications were provided to him in envelopes or

1 packages that did not identify the Medication or by doctors or trainers who oftentimes
 2 failed to identify the Medication. He specifically remembers receiving Toradol by
 3 injection for almost every game he played with the Chargers. He also remembers
 4 receiving Vicodin or Percocet and Celebrex tablets. Team doctors, including Drs.
 Jerry Hizon and Catherine Robertson, administered the injections. Trainers,
 including James Collins, administered the tablets/capsules.

5 **SUPPLEMENTAL ANSWER:** Mr. Walker provides the following information
 6 currently within his knowledge. Mr. Walker does not recall the dosage of the Medications he
 7 received (unless otherwise indicated below) and, more often than not, the person providing the
 8 Medication to Mr. Walker did not advise him of the dosage and, to the extent the Medication was
 9 provided in a container (regardless of what type of container), the container did not identify the
 10 dosage.

11 Mr. Walker further states that:


- 12 • During his employment with the Arizona Cardinals, he regularly received – and
 13 took upon receipt – pain-numbing and anti-inflammatory Medications in tablet or
 14 capsule form. Often these Medications were provided to him in envelopes or
 15 packages that did not identify the Medication or by doctors or trainers who failed
 16 to identify the Medication. He specifically remembers receiving Toradol by
 17 injection for almost every game he played with the Cardinals. He also remembers
 receiving Celebrex tablets. Team doctors, including Drs. Amit Sahasrabudhe and
 Doug Freedberg, administered the injections. Trainers, including Jeff Herndon,
 Jim Shearer and Tom Reed administered the tablets/capsules.
- 18 • During his employment with the San Diego Chargers, he regularly received – and
 19 took upon receipt- pain-numbing and anti-inflammatory Medications in tablet or
 20 capsule form. Often these Medications were provided to him in envelopes or
 21 packages that did not identify the Medication or by doctors or trainers who
 22 oftentimes failed to identify the Medication. He specifically remembers receiving
 Toradol by injection for almost every game he played with the Chargers. He also
 remembers receiving Vicodin or Percocet and Celebrex tablets. Team doctors,
 including Drs. Jerry Hizon and Catherine Robertson, administered the injections.
 Trainers, including James Collins, administered the tablets/capsules.

23
 24 5. Other than those PERSONS listed in YOUR response to Interrogatory Number 4,
 25 IDENTIFY each PERSON (including any HEALTHCARE PROVIDER, to include any
 26 HEALTHCARE PROVIDER from whom you sought a second medical opinion) who provided
 27 YOU with MEDICATIONS, treatment, medical advice, or medical services during YOUR
 28 career playing football for NFL MEMBER CLUBS, the date(s) on when the treatment, care, or
 services were rendered, and the NFL MEMBER CLUB who employed YOU at the time the
 treatment, care, or services were rendered, and IDENTIFY the MEDICATIONS, treatment,
 medical advice, or medical services provided.

VERIFICATION

I, Reginal Walker, am familiar with the contents of my Supplemental Answers to the Defendant NFL Member Clubs' Interrogatories served herewith. My answers are based on, and therefore necessarily limited by, the records and information in existence, presently recollected, and thus far discovered in the course of prosecuting this action. Subject to the limitations set forth herein, and without waiving my right to amend these answers based on subsequently-identified information, I verify under penalty of perjury that my Supplemental Answers are true and correct to the best of my knowledge, information and belief.

Executed this ¹⁶ _____ day of May, 2017.



Reginald Walker